

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

JANIS BROWNE, AS PERSONAL
REPRESENTATIVE FOR SHENIKA GORE
AND JEANEISHA MCFARLANDE,

Plaintiffs,

v.

GENERAL MOTORS, LLC,

Defendant.

Case No.: 1:16-CV-00085-WAL-GWC

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**NOTICE OF VIDEOTAPED 30(B)6 DEPOSITION OF
DEFENDANT GENERAL MOTORS, LLC**

TO: Paul Neil, Esq.
Barnes & Neil
1134 King Street, Second Floor
P.O. Box 224589
Christiansted, VI 00822
pneil@barnesneil.com

PLEASE TAKE NOTICE that pursuant to Rules 30(B)6 of the Federal Rules of Civil Procedure, Plaintiff(s), by and through undersigned counsel, will take the oral examination of on **July 9, 2019 at 10:00 a.m.** at **Hanson Renaissance Court Reporters, 400 Renaissance Center, Suite 2160, Detroit, MI 48243.** Defendant shall designate one or more officers, directors, or managing agents who are competent to testify on the company's behalf. That person(s) who is designated to testify on Defendant's behalf should have knowledge of, but not limited to, the following:

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DEFINITIONS AND INSTRUCTIONS

Unless otherwise specified, the Notice shall be governed by the following definitions and instructions:

A. "Documents" mean any written, printed, typed or graphic matter of any kind or nature however produced or reproduced, whether sent or received or neither, including all drafts and copies bearing notations, marks or matter not found on the original; it includes but is not limited to, all contracts, agreements, representations, warranties, opinions, amendments or modifications thereof; all letters or other forms of correspondence or communications, including but not limited to e-mails, notes, messages and reports studies, analyses, evaluations and all photographs.

B. "You" means

The deponent specified should be the person or persons most knowledgeable about the following areas:

1. The experience and background of the deponent;
2. All facts concerning the subject accident;
3. The corporate relationship between General Motors and Chevrolet;
4. Design, function, and testing of the occupant presence sensing system in the subject vehicle;
5. Design, function, and testing of the Sensing Diagnostic Model in the subject vehicle;
6. Design, function, and testing of the front passenger airbag system in the subject vehicle;
7. Any and all design and/or manufacturing changes to the occupant presence sensing system in the Chevrolet Aveo in the past ten (10) years;
8. Any and all design and/or manufacturing changes to the front passenger airbag system in the Chevrolet Aveo in the past ten (10) years;
9. The design and function of the front and rear seat anchorages in the subject vehicle;

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10. The testing of the front and rear seat anchorages in the subject vehicle, including but not limited to those contained at Bates Browne000000486-559;
11. The testing of the seat moment testing, including but not limited to those contained at Bates Browne000000563-630;
12. The design and function of the front and rear seat belt anchorages in the subject vehicle;
13. The testing of the front and rear seat belt anchorages in the subject vehicle, including but not limited to those contained at Bates Browne000000631-757 and Browne000001475-2135;
14. Seat rearward moment testing for the subject vehicle, including but not limited to those contained at Bates Browne000000758-813;
15. The design and function of the front and rear seat restraining devices in the subject vehicle;
16. The testing of the front and rear seat restraining devices in the subject vehicle, including but not limited to those contained at Bates Browne000000814-875, and Browne000002142-2153;
17. The testing of the seat belt anchorages, including but not limited to those contained at Bates Browne000000876-1278;
18. All produced GM Evaluation Reports pertaining to the subject vehicle;
19. All produced Test Reports pertaining to the subject vehicle;
20. Engineering Judgment Letters regarding compliance with specified standards for the subject vehicle;
21. NAO Procedure Development/Validation for occupant protection;

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22. GM Worldwide Engineering Standards Test Procedures, including but not limited to the GM Worldwide Engineering standards produced at Bates Browne000002171-2342 and Browne000002374-2579;
23. General Motor's Product Program Content;
24. Any and all Final Reports to the Performance Assessment Committee (PAC), including any and all PAC Report Supplements for the 2007 T-Car/Chevrolet Aveo;
25. Any and all Final Reports to the Performance Assessment Committee (PAC), including any and all PAC Report Supplements for the 2009 T-Car/Chevrolet Aveo;
26. The 2009 T-Car/Chevrolet AVEO Passenger Sensing System (IEE OC System) Final Performance Peer Review.
27. All applicable FMVSS standards;
28. GMUTS Procedure Development/Validation pertaining to the subject vehicle for the safety belts, passive restraints, and/or supplemental inflatable restraints (air bags).

Said deposition will be taken before a Notary Public commissioned by the Territory of the Virgin Islands or other person qualified to administer the oath and take depositions. Said deposition is being taken for use as evidence and for purposes of discovery of evidence and may be continued from day to day until completed.

Respectfully submitted,

Dated: June 28, 2019

/s/ Jeffrey P. Goodman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of June, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following, and that I sent the filing to all non-filer users via U.S. Mail, postage prepaid:

Daryl C. Barnes, Esq.

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/s/ Jeffrey P. Goodman